

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN RE: SUBPOENAS TO NON-PARTIES  
KOFI TECHNOLOGIES, INC. and  
KOFI TECHNOLOGIES GROUP,  
INC.**

**CSS, INC.,**

**Plaintiff,**

**v.**

**CHRISTOPHER HERRINGTON,  
GENE YOHO and COMPILED  
TECHNOLOGIES, LLC,**

**Defendants.**

**CASE NO. 3:17-mc-71**

**Related to 2:16-cv-07162  
(S.D. W.Va. Charleston Division)**

**KOFI TECHNOLOGIES GROUP, INC.’S AND KOFI  
TECHNOLOGIES, INC.’S JOINDER IN CSS, INC.’S  
MOTION TO QUASH THIRD-PARTY SUBPOENAS AND  
MOTION FOR PROTECTIVE ORDER**

PLEASE TAKE NOTICE that non-parties Kofi Technologies Group, Inc. and Kofi Technologies, Inc. (collectively, the “Kofi Entities”) hereby join in CSS, Inc.’s Motion to Quash Third-Party Subpoenas and Motion For Protective Order and Brief In Support (“CSS, Inc.’s Motion”) for all the reasons stated therein, including the Objections served by the Kofi Entities on the Defendants attached to CSS, Inc.’s Appendix [Doc. 2] Exhibit C in Support of its Motion.

Rather than file a separate motion to quash or for protective order, and to avoid needless repetition, the Kofi Entities join in CSS, Inc.’s Motion and hereby adopt all applicable arguments, objections, and requests set forth therein (including the exhibits attached thereto) with respect to the subpoenas *duces tecum* served by the Defendants on the Kofi Entities.

For the same reasons advanced by CSS, Inc. in its Motion, the Kofile Entities respectfully request that the Court grant CSS, Inc.'s Motion and quash the third-party subpoenas served on Kofile Technologies Group, Inc. and Kofile Technologies, Inc., or enter a protective order prohibiting Defendants from obtaining discovery pursuant to the subpoenas served on the Kofile Entities.

Dated: September 15, 2017

Respectfully submitted,

By: /s/ Walter A. Herring

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**ATTORNEYS FOR  
KOFI TECHNOLOGIES  
GROUP, INC. AND  
KOFI TECHNOLOGIES, INC.**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing document was served via U.S. Mail and e-mail upon all counsel of record in accordance with the Federal Rules of Civil Procedure on September 15, 2017.

/s/ Walter A. Herring

Walter A. Herring

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